

Department of Public Instruction guidance and frequently asked questions on operating the USDA Child Nutrition Programs during a school closure or dismissal due to the COVID-19.

**See also the following USDA Guidance:

- 1) [Memorandum SP 08-2020 Q & A Child Nutrition Program Meal Service during COVID-19 Outbreaks.](#)
- 2) [Q&A on Summer Food Service Program and Seamless Summer Option Meal Delivery Using Existing Authority](#)

1. Are schools required to provide meals during a school dismissal?

No. However, SFAs are encouraged to ensure that the needs of low-income children are met during extended schools dismissal.

2. **Updated 3/18: If our SFA elects to close or dismiss schools due to the COVID-19, how do we get approval to continue to provide and claim meals for students?**

The State Agency (SA) has received approval from USDA to allow School Food Authorities (SFAs) to claim meals in a non-congregate setting. This approval has been posted on the [Child Nutrition Programs COVID-19 webpage](#).

SFAs may claim meals provided during a school dismissal either through the Summer Food Service Program (SFSP) or the Seamless Summer Option (SSO). See this [decision flow chart](#) to determine which program to utilize.

For SFAs and other SFSP sponsors that participate in the SFSP, complete the [SFSP Google Survey](#) and notify Amy Kolano by email amy.kolano@dpi.wi.gov that you plan to participate in SFSP. The SFSP contract must be updated for 2020 to include the dates of the school closure. Further instruction will be provided on contract completion once Amy Kolano is notified.

For SFAs that will participate in the SSO, complete this [Google form](#) to apply for a waiver to continue to provide and claim meals during a closure or dismissal. No update to the School Nutrition contract is required, unless you are notified to do so.

Important: Any SFA, school, or non-school SFSP sponsor that has not contacted the SA and did not update the SFSP contract or complete the SSO waiver cannot claim meals served during school closures and dismissals related to COVID-19.

3. **Updated 3/18: The SFSP and SSO regulations only allow schools with 50% or more of their enrolled students certified as eligible for free and reduced to qualify. Can schools that have less than 50% of their enrolled students certified as free or reduced participate in SSO or SFSP under this waiver?**

Yes, all schools that currently participate in the USDA Child Nutrition Programs have the option of

providing meals to all students free of charge regardless of the schools free and reduced percentage. These SFAs would operate under the SSO and this requirement is waived only for school closure or dismissals under the COVID-19 waiver.

Schools with less than 50% free and reduced must have a plan in place so that meal distribution methods more directly target households of enrolled students who are eligible for free or reduced price meals. Please ensure this is done in a way that does not overtly disclose student eligibility.

Please note, USDA issued a [Q&A](#) on 3/18 that indicates meals can only be delivered for free and reduced price students. The WI DPI has received approval from USDA to allow the program to be offered to all students and therefore meals may be provided in the manner most appropriate, regardless of eligibility.

4. What meal pattern must be followed?

If your agency will operate under the SFSP, you have the option to follow the SFSP meal pattern or the NSLP and SBP meal patterns.

If your SFA will operate under the SSO, you will continue to follow the NSLP, SBP and Afterschool Snack meal patterns, as applicable.

5. Updated 3/30: Are there any meal pattern flexibilities available, such as milk variety and vegetable subgroups?

The USDA issued [COVID-19: Child Nutrition Response #4, Nationwide Waiver to Allow Meal Pattern Flexibility in the Child Nutrition Programs \(CNP\)](#). This waiver allows the DPI to grant meal pattern flexibility waivers to CNPs experiencing disruptions to the availability of food products. If you are participating in a CNP and are **currently** experiencing a difficulty procuring and serving one or more components per meal pattern requirements, a [Meal Pattern Flexibility Waiver](#) may be completed to request a waiver. If new additional component disruptions occur, additional waiver requests must be submitted.

Agencies must resume normal meal pattern requirements as soon as products become available. Please keep in mind that it is always best practice to provide children with a variety of healthy options that aligns as closely as possible with the meal pattern requirements.

Approved waivers are valid until April 30, 2020, or until expiration of the federally declared public health emergency, whichever is soonest. Following April 30, all meal pattern requirements are reinstated.

6. Updated 3/30: What if we are unable to procure allowable milk or no milk at all?

The USDA issued [COVID-19: Child Nutrition Response #4, Nationwide Waiver to Allow Meal Pattern Flexibility in the Child Nutrition Programs \(CNP\)](#). This waiver allows the DPI to grant meal pattern flexibility waivers, including the milk component, to CNPs experiencing disruptions to the availability of food products. If you are participating in a CNP and are currently experiencing a difficulty procuring and serving the milk component per meal pattern requirements, a [Meal Pattern Flexibility Waiver](#) may be completed to request a waiver.

Agencies must resume serving the normal milk meal pattern requirements as soon as products become available. Approved waivers are valid until April 30, 2020, or until expiration of the federally declared public health emergency, whichever is soonest. Following April 30, all meal pattern requirements are reinstated.

7. Is there flexibility on which National School Lunch Program and School Breakfast Program meal pattern age/grade groupings to use?

An open or restricted open site may have difficulty following the age/grade group requirements of the meal pattern due to a variety of age/grade groups that may attend. In this scenario, the site may use the meal pattern for a single age/grade group meeting the minimum meal pattern requirements for the most common age/grade group eating at the site.

8. If I provide meals under the SFSP or SSO, does that require me to also provide meals over the summer?

No.

9. Updated 3/30: How are meals claimed under the SFSP or SSO?

- Agencies will have the following options to determine which children can be claimed in either the SFSP and SSO:
 - Open - all children eat free in communities, aged 18 and under.
 - Restricted Open - sites that meet the open site criteria, explained above, but are later restricted for safety, control, or security reasons. Serves children age 18 and under.
 - Closed enrolled - group of children are identified, such as within a school or district, aged 18 and under.
- All children ages 18 and under can eat free and are claimed at the free rate for both programs.
- Separate meal counts and records must be maintained for meals served under a COVID-19 waiver.
- Meals can be claimed everyday including weekends.

SFSP: Meals will be claimed online under the SFSP claiming process. It will be done on a monthly basis. Do not submit combined claims during this school closure time period. SFSP claim instructions can be found on our website at:

<https://dpi.wi.gov/community-nutrition/sfsp/claiming-reimbursement>.

SSO: Please refer to the [COVID-19 Seamless Summer Option Claim Manual](#) for specific instructions for submitting claims.

10. Updated 3/25: What about agencies who participate in the Child and Adult Care Food Program (CACFP)? (SP 04-2020)

If the agency participates in the CACFP, meals should be provided and claimed through CACFP. If the agency is closed due to COVID-19, then children that normally attend may continue to receive meals using a non-congregate feeding method (home delivery, drive through or curbside pickup, walk up with plans to keep individuals six feet apart). If your CACFP agency would like to participate in the non-congregate feeding or other CACFP nationwide waivers you must notify DPI of your plan by filling out this form: <https://forms.gle/r6cA6tEuXmYyohnS9>

11. New 3/30: May children that are unable to attend a child care center or family day care home due to a closure participate in SSO or SFSP sites operating during this school closure?

Yes, if the meal feeding site is operating as an open site. Open sites may feed all children ages 18 and under.

12. New 3/30: May school age children who attend a child care center or family day care home due to a school closure participate in SSO or SFSP sites?

Yes, if the childcare center is not providing and claiming meals for those children.

13. New 3/30: If SFAs have requests from childcare providers to pick-up meals at the open SFSP or SSO sites, they should follow the outline below:

1) Confirm that the child care provider is not participating in the CACFP. If they are participating in CACFP, they are not eligible for meals through the school district.

2) The childcare provider needs to confirm with the parents of enrolled children that would be receiving meals from the District that they are not receiving meals in another manner (via home delivery or pickup point).

3) If no, the childcare provider could call the school and tell them they would like to obtain meals for school-age children and siblings of school-age children. They would provide the number of meals they would need to pick-up and state that they have verified that the children they are obtaining meals for are not receiving meals via another method from the school. The verification from parents could be done just one time.

14. New 3/30: Under COVID Response #3: Nationwide Waiver of the Activity Requirement in Afterschool Care Child Nutrition Programs, can SFAs who are participating in SSO (providing breakfast and lunch), to also provide a snack under NSLP.

Yes. A maximum of two meals can be claimed per day under SSO or SFSP. The snack would be claimed under NSLP. This would allow an SFA to have the ability to claim SBP, NSLP and Afterschool Snack on the same day. If the school(s) providing meals does not currently have the Afterschool Snack program indicated on their NSLP contract, an update will be required. Contact the [School Nutrition Team](#) for more information.

This waiver also removed the requirement for an afterschool enrichment activity to participate in the Afterschool Snack Program during a COVID-10 school closure.

15. What reporting requirements will there be?

Agencies will need to separately report which meals claimed were provided while utilizing the SFSP or SSO under this waiver. Meal counts do not need to be collected by name or eligibility. The total meal count will be reported since all meals are served at the free rate. Those providing meals through the SSO can find meal counting and claiming forms are located on our website [here](#). SFSP sponsors can find meal counting forms on the [SFSP Materials and Resources](#) page.

16. Can meals only be provided to the households eligible for free or reduced price meals?

No. The SFSP and SSO program requirements are to offer free meals to all children.

17. May meals be provided to siblings who may not be in school or who do not attend the dismissed school?

Yes, if the site operates as an open site, all children age 18 and under in that household may be served and claimed at the free rate.

18. New 3/30: May parents or guardians pick up meals for their children, without the children being present?

Yes. USDA issued a nationwide [Waiver to Allow Parents and Guardians to Pick Up Meals for Children](#). The USDA Food and Nutrition Service (FNS) recognizes that in this public health emergency, continuing to require children to come to the meal site to pick up meals may not be practical and in keeping with the goal of providing meals while also taking appropriate safety measures. Under this waiver, Program operators may distribute meals to a parent or guardian to take home to their children. State agencies must have a plan for ensuring that Program operators are able to maintain accountability and program integrity.

The WI state plan for ensuring accountability and program integrity includes the following:

- Maintain Accountability and Integrity: The meals are to be provided to eligible children (18 years and under). Parents/Guardians are to share the school name where each child attends that they are requesting meals for, if the children are of school age.
- Communication: Post signage and update any existing communication (i.e. emails, web posting, social media) to include this information. The [Parent Pick Up State Policy sign](#) can be found on the [Child Nutrition Program COVID-19 Information webpage](#) under DPI Guidance.

19. Can we serve parents and other adults in the community if they pay for the meal?

If the SFA or SFSP sponsor has the capacity to provide meals to adults, they may do so but will not be reimbursed for those meals. Adults must either pay for their meals or if you elect not to charge adults, other non-school food service funding must be used to pay for those meals.

20. Updated 3/30: The SSO establishes time frames for serving breakfast and lunch. Can this requirement be waived?

Yes. The USDA issued a [Nationwide Waiver to Allow Meal Service Time Flexibility in the Child](#)

Nutrition Programs. SFAs are able to determine meal service times that best suit their operations and allows multiple meals to be provided at once.

21. Added 3/17: Can we provide multiple days' worth of meals at once to households?

Yes. You may provide meals for up to one week for households at one time. In doing so, here are some things to consider – the meals are supposed to be unitized (all components provided together – no offer versus serve). That could amount to quite a bit of food if there are multiple children in a family. If all of the items are shelf stable, that will help. If milk or other items need to be refrigerated, some families may not have the space to store all of that properly. Maybe give the option to the families as to how many meals that want to take the day you serve, just in case space/storage is an issue. This distribution process is included in the waiver questionnaire.

Food may be provided in a “bulk” manner if a menu is provided, which includes the specific items that were planned and prepared for specific meals. Any further preparation, food safety or portion size instructions should also be included to ensure households know what was provided for each meal. Ex. A grocery bag may include all the meal components for breakfast and lunch for a 5-day period, along with the menu and instructions for households.

22. Updated 3/18: Spring break is coming up soon, if we choose to continue meal service during this “planned” break, can we claim those meals?

Per the [USDA Q&A](#), spring breaks that are postponed or rescheduled due to the unforeseen public health emergency may serve meals during that week. Since all WI schools are now closed for the duration of the public health emergency, WI DPI has determined that Spring Break has been cancelled and therefore, meals provided during this week are allowable and may be claimed for reimbursement.

23. Updated 3/18: Our SFA is planning to continue to operate in a virtual manner; may we provide and claim meals to households through SSO or SFSP?

Yes. See also Q9 in the [USDA Q&A](#).

24. New 3/18: Can meals be delivered to a students home?

[See this USDA Q&A](#). Please note, this Q&A indicates meals can only be delivered for free and reduced price students. The WI DPI has received approval from USDA to allow the program to be offered to all students and therefore meals may be provided in the manner most appropriate, regardless of eligibility. With that being said, meal distribution methods do need to more directly target households of enrolled students who are eligible for free or reduced price meals. Please ensure this is done in a way that does not overtly disclose student eligibility.

25. If community members or organizations have offered to donate money or gift cards to help households that qualify for free or reduced, can a school share which students qualify for free or reduced meals?

Not without parental consent. Student eligibility is confidential and disclosure requirements per the [Eligibility Manual](#) remain in place during this time. The SFA can send out a communication to

households letting them know how they can take advantage of this opportunity and self-disclose that they are eligible by providing their notification of benefits letter from the SFA.

26. *New 3/17, Updated 3/18:* Is reimbursement for mileage and meal delivery costs (staff time/benefits/gas/mileage) an allowable food service expense?

Yes, as long as the delivery costs are for food service purposes. Make sure the time is tracked specifically for this food service function and ensure you practice safe food handling during delivery. The food service account cannot pay for other tasks/deliveries unrelated to food service. See also Q2 in the [USDA Q&A](#).

27. *New 3/17:* Are there established federal and/or state rates that public school districts must use when reimbursing staff for mileage?

Most businesses use the maximum reimbursement rates set by the IRS. Many districts choose to use this rate also but they can set whatever rate they like as long as it is in approved district policies.

<https://www.irs.gov/newsroom/2017-standard-mileage-rates-for-business-and-medical-and-moving-announced>

28. *New 3/18:* Can a school accept food donations and utilize as part of a reimbursable meal?

Schools may accept and use donated food from other schools that participate in the USDA Child Nutrition Programs and have extra food they want to share, including USDA Foods. This food may be used as part of a reimbursable meal.

Any non-school organization or business that is interested in donating food should be directed toward local food pantries, the Red Cross, etc. This food cannot be utilized in a reimbursable meal.

29. *New 3/25:* Agencies currently participating in the Child and Adult Care Food Program (Child care, Head Start, At-Risk, etc.) are able to provide non-congregate meals?

Yes, on March 20, the USDA issued three nationwide waivers that include the Child and Adult Care Food Program (CACFP) to support access to nutritious meals while minimizing potential exposure due to COVID-19.2020. These include non-congregate feeding, meal service time flexibility, and waived the afterschool educational/ enrichment requirement. CACFP agencies must elect to participate in the waivers by [clicking on the link to notify the DPI of your plan to participate: https://forms.gle/r6cA6tEuXmYyohnS9](https://forms.gle/r6cA6tEuXmYyohnS9). All other CACFP regulations and proper documentation must be maintained.

30. *New 3/25:* Can the SFA package and distribute frozen food items (e.g. precooked chicken nuggets) and/or shelf-stable foods that need to be cooked at home (e.g dry pasta) as part of the reimbursable meals?

Yes, if specific measures are taken. These food items must meet the applicable NSLP/SBP (i.e. SSO) or SFSP meal pattern requirements in order to be served as part of the reimbursable meal. Additionally, SFAs should ensure that these types of food items are distributed with clear cooking instructions for the household to follow, including directions to heat the food to an internal temperature of 165 degrees F before consuming. For frozen items, the SFA should also communicate safe storage guidelines if the foods will not be prepared and eaten immediately.

Safe storage guidelines for items intended to be heated at home should advise that the foods be held at 41 degrees F or below (or kept frozen, if applicable) until used.

If SFAs choose to include frozen food items in the meals, the items should be labeled as “fully cooked,” “precooked,” or “ready-to-eat” on the manufacturer’s packaging. SFAs **should not** distribute any raw animal-based time/temperature control for safety (TCS) food items, such as raw chicken, raw eggs, raw beef, etc. There are many frozen [State Processed Products](#) available that could be incorporated into reimbursable meals.

If you are unsure if a frozen item may be considered “fully cooked,” “precooked,” or “ready-to-eat,” please contact your local regulatory authority and/or sanitarian to discuss your specific question and obtain additional guidance. If you have questions about a state processed product on the list above, please contact a DPI USDA Foods team member.

31. New 3/18: USDA Foods and school closures:

- **Can we use USDA Foods during an unanticipated school closure?**
Yes
- **If your school has issues with USDA Foods deliveries or has surplus of USDA Foods inventory please contact the USDA Foods team:**
USDA Foods Team Contact Information:
 - Email: DPISNUSDAFoods@dpi.wi.gov
 - Phone: (608) 266-3615
- **What if our school does not participate in USDA Foods Program and would be interested in receiving USDA Foods?**
If your school does not participate in the USDA Foods Program and needs additional foods to serve meals please contact the [USDA Foods team](#) to discuss options.
- **What can a school do to help mitigate possible increase in storage costs incurred by school closure?**
DPI is trying to assist with the coordination of USDA Foods inventory between schools. We are working on a plan and guidance. In the meantime contact the USDA Foods team if your school has inventory it would like to share with other schools or if you are in need of additional inventory.

32. New 3/25: Emergency Procurements and USDA Foods Donations/Transfers:

Please find the following guidance on emergency procurements/purchases.

Some food service operators are continuing to provide meals during the COVID-19 school closure. In order to react appropriately to food service changes, school food service staff are needing to make unplanned purchases. Schools in this situation can follow federal USDA regulations found in

2 CFR 200 which allow for a type of procurement called an “Emergency Procurement”. The specific regulations are as follows:

2 CFR §200.320 Methods of procurement to be followed.

(f) Procurement by noncompetitive proposals. Procurement by noncompetitive proposals is procurement through solicitation of a proposal from only one source and may be used only when one or more of the following circumstances apply:

(2) The public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation;

Emergency Procurement: What does this mean?

This means, if necessary, school food service staff can conduct emergency purchases to continue uninterrupted food service using noncompetitive procurement methods. This type of procurement or purchase is short term in duration. Records must be kept to track these types of purchases. For example, a log of all such purchases must be maintained and reviewed monthly by the school food service department. The log of emergency purchases should show:

- **Contractor/Supplier Name**
- **Contractor/Supplier primary contact information and address**
- **Contractor/Supplier name of person supplying pricing**
- **Purchase amount/contract value**
- **Description of product and/or service being purchased/contracted**
- **If applicable, duration of contract (contract term)**
- **Reason for emergency**

Inventory Management during school closures.

During a school closure, the school food service staff must continue to monitor inventory levels and plan for orders placed prior to the school closure. Schools that are not serving meals might want to donate or transfer products to other schools or food pantries that are open and continuing to provide meals.

Schools may donate or transfer products in the food service inventory located at either the school site(s) or at contracted distributors. Schools participating in USDA Child Nutrition programs that are considering donating or transferring products must follow proper donation/transfer of products guidelines. These guidelines are as follows:

- Document all donations or transfers of products purchased using Fund 50 funds. Documentation should include description of the items donated, quantity, date of transaction, and name of the receiving school or agency. Receiving schools and agencies should have the same documentation.
- Primary option: Schools can donate to another school that is providing meals during the school closure.

- Schools can choose to swap food items, or transfer food products to another school. Schools can negotiate a charge to the receiving school or offer the food items at no charge.
- Link to schools/sites still serving meals: Pending
- Secondary option: If no other school is available, schools can donate to food pantries like those in The Emergency Food Assistance Program (TEFAP) or a nonprofit agency like a homeless shelter, food bank, daycare, or other food pantries.
 - Link to TEFAP: <https://www.dhs.wisconsin.gov/nutrition/tefap/index.htm>

Food Safety: Minimize the time TCS foods are in the temperature danger zone (between 41° and 135°). Maintain the proper temperature during transport by utilizing coolers, cooler bags, ice, ice packs, or insulated bags.

School Closures and USDA Foods: The transfer and donation guidance provided above is applicable to USDA Foods products. The Department of Public Instruction (DPI) School Nutrition Team is conducting surveys of schools, distributors, and other stakeholders to help coordinate transfers and donations of USDA Foods products. If you receive a survey, please complete it as best as you can at the time. We understand information and circumstances are continually changing. If you have not received one of these recent surveys and have USDA Foods products you would like to donate or transfer, you contact us at (608) 266-3615 or email: DPISNUSDAFoods@dpi.wi.gov.

If you have further questions, please call (608) 266-3615 or email: DPISNUSDAFoods@dpi.wi.gov

Additional information can be found on our [Child Nutrition Program COVID-19 Information](#) webpage.

33. **New 3/26:** [DPI Guidance for Schools using Commercial Distributors:](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/guidance-schools-using-commercial-distributors.pdf)
(<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/guidance-schools-using-commercial-distributors.pdf>)
34. **New 3/26:** [DPI Guidance for Schools using State Delivery:](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/guidance-schools-using-state-deliveries.pdf)
(<https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/guidance-schools-using-state-deliveries.pdf>)
35. **New 3/30:** My SFA is scheduled for an Administrative Review (AR) this year between March 16-May 31. Will the AR be postponed?

Yes, all ARs from March 16-May 31 will be rescheduled for the following school year. The Nutrition Program Consultant assigned to complete the review will be reaching out to all SFAs scheduled during this timeframe.